

**STEVEN S. BISS**

ATTORNEY AT LAW  
300 WEST MAIN STREET, SUITE 102  
CHARLOTTESVILLE, VIRGINIA 22903  
TELEPHONE: 804-501-8272  
FAX: 202-318-4098  
EMAIL: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)  
[stevensbiss@protonmail.ch](mailto:stevensbiss@protonmail.ch)  
<https://truthsocial.com/@stevenbiss>

MATTER NO.

296-001

February 18, 2023

**VIA CM/ECF**

Hon. Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 18A  
New York, New York 10007

**RE: Flynn v. Cable News Network, Inc.**  
**Case 1:21-cv-02587 (GHW/SLC)**

Dear Judge Cave:

I represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter.

Pursuant to Federal Rule of Civil Procedure 5.2(e) and 26(c) and Your Honor’s Individual Practice Rule 1.G, I respectfully request leave to file under seal the unredacted version of my Response to CNN’s letter-motion [*ECF No. 109*] given that the document contains material that has been designated by Plaintiffs as “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order [*ECF. No. 60*].

I apologize that I did not seek leave to file the Response under seal before filing. I want to cure this problem pursuant to Your Honor’s February 17, 2023 Order.

Yours very truly,

**/s/ *Steven S. Biss***

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.